

Fill in this information to identify the case:

Debtor 1 Ricky M. Farris

Debtor 2 Lillian Farris  
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of Texas  
(State)

Case number 18-40413

## Form 4100R

Amended **Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of creditor: U.S. Bank Trust National Association, as  
Trustee of the Igloo Series III Trust Court claim no. (if known): 2

Last 4 digits of any number you use to identify the debtor's account: 8139

Property address: 1625 Crown Point Drive  
Number Street

Little Elm, TX 75034  
City State ZIP Code

**Part 2: Prepetition Default Payments**

Check one:

- ☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☒ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ 15,646.59

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 7,018.67
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ (907.59)
- c. **Total.** Add lines a and b. (c) \$ 6,111.08

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

11 / 01 / 2020  
MM / DD / YYYY

Debtor 1 Ricky M. Farris Case number (if known) 18-40413  
First Name Middle Name Last Name

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Chase Berger  
Signature

Date 02 / 15 / 2021

Print Chase Berger, Esq.  
First Name Middle Name Last Name

Title Authorized Agent

Company Ghidotti Berger, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 1920 Old Tustin Avenue  
Number Street

Santa Ana, CA 92705  
City State ZIP Code

Contact phone (949) 427 - 2010

Email bknotifications@ghidottiberger.com



Payment Changes				
Date	P&I	Escrow	Total	Notice Filed
4/1/2018	\$825.14	\$623.71	\$1,448.85	POC
12/1/2019	\$825.14	\$957.47	\$1,782.61	NOPC
2/1/2020	\$825.14	\$960.26	\$1,785.40	NOPC

Loan Information	
Loan #	
Borrower	Lillian Farris
BK Case #	18-40413
Date Filed	3/1/2018
First Post Petition Due Date	4/1/2018
POC Covers	No POC

BSI Did Not file a POC. DC filed POC for Mtg Arrears iao \$7134.00

Date	Amount Rcd	Late Charges Incurred	Post Pet Due Date	Intracutal Due Da	Amt Due	Over/Short	Suspense Credit	Suspense Debit	Suspense Balance	POC Arrears Credit	POC Debit	POC Suspense Balance	POC Paid to Date	APO Credit	APO Debit	APO Suspense Balance	APO Paid to Date	Comments
4/18/2018	\$1,448.85		4/1/2018	11/1/2016	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
5/30/2018	\$1,448.85		5/1/2018	12/1/2016	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
6/29/2018	\$1,448.85		6/1/2018	1/1/2017	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
8/9/2018	\$1,448.85		7/1/2018	2/1/2017	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
8/31/2018	\$1,448.85		8/1/2018	3/1/2017	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
10/7/2018	\$1,448.85		9/1/2018	4/1/2017	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
10/30/2018	\$1,448.85		10/1/2018	5/1/2017	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
11/29/2018	\$1,448.85		11/1/2018	6/1/2017	\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
12/26/2018	\$1,448.85		12/1/2018		\$1,448.85	\$0.00			\$0.00			\$0.00	\$0.00			\$0.00	\$0.00	
12/31/2018		Pre-Pet Disb				\$0.00			\$0.00	\$173.71		\$173.71	\$173.71			\$0.00	\$0.00	
1/28/2019	\$1,448.85		1/1/2019	7/1/2017	\$1,448.85	\$0.00			\$0.00			\$173.71	\$173.71			\$0.00	\$0.00	
1/30/2019		Pre-Pet Disb		8/1/2017		\$0.00			\$0.00	\$410.65		\$584.36	\$584.36			\$0.00	\$0.00	
3/6/2019		Pre-Pet Disb				\$0.00			\$0.00	\$347.67		\$932.03	\$932.03			\$0.00	\$0.00	
3/6/2019	\$1,448.85		2/1/2019	9/1/2017	\$1,448.85	\$0.00			\$0.00			\$932.03	\$932.03			\$0.00	\$0.00	
3/28/2019		Pre-Pet Disb		10/1/2017		\$0.00			\$0.00	\$370.56		\$1302.59	\$1302.59			\$0.00	\$0.00	
4/9/2019	\$1,448.85		3/1/2019	11/1/2017	\$1,448.85	\$0.00			\$0.00			\$1302.59	\$1302.59			\$0.00	\$0.00	
5/2/2019		Pre-Pet Disb				\$0.00			\$0.00	\$395.14		\$1697.73	\$1697.73			\$0.00	\$0.00	
5/3/2019	\$1,448.85		4/1/2019	12/1/2017	\$1,448.85	\$0.00			\$0.00			\$1697.73	\$1697.73			\$0.00	\$0.00	
5/31/2019	\$1,448.85		5/1/2019	1/1/2018	\$1,448.85	\$0.00			\$0.00			\$1697.73	\$1697.73			\$0.00	\$0.00	
6/7/2019		Pre-Pet Disb				\$0.00			\$0.00	\$422.21		\$2119.94	\$2119.94			\$0.00	\$0.00	
6/28/2019	\$1,448.85		6/1/2019	2/1/2018	\$1,448.85	\$0.00			\$0.00			\$2119.94	\$2119.94			\$0.00	\$0.00	
7/3/2019		Pre-Pet Disb				\$0.00			\$0.00	\$457.79		\$2577.73	\$2577.73			\$0.00	\$0.00	
7/3/2020		Pre-Pet Applied		3/1/2018		\$0.00			\$0.00		\$1,448.85	\$1,128.88	\$2,577.73					
7/31/2019	\$1,448.85		7/1/2019		\$1,448.85	\$0.00			\$0.00			\$1,128.88	\$2,577.73			\$0.00	\$0.00	
7/31/2019		Pre-Pet Disb				\$0.00			\$0.00	\$513.10		\$1,641.98	\$3,090.83			\$0.00	\$0.00	
8/30/2019		Pre-Pet Disb				\$0.00			\$0.00	\$513.10		\$2,155.08	\$3,603.93			\$0.00	\$0.00	



On February 16, 2021 I served the following documents described as:

- **AMENDED RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope addressed as follows:

(Via United States Mail)

<b>Debtor</b> Ricky M. Farris 1625 Crown Point Dr. Frisco, TX 75034	<b>Chapter 13 Trustee</b> Carey D. Ebert P. O. Box 941166 Plano, TX 75094-1166
<b>Debtor</b> Lillian Farris 1625 Crown Point Dr. Frisco, TX 75034	<b>U.S. Trustee</b> US Trustee Office of the U.S. Trustee 110 N. College Ave., Suite 300 Tyler, TX 75702
<b>Debtors' Counsel</b> Diane S. Barron Barron and Carter, LLP 660 N. Central Expy, Ste 101 Plano, TX 75074	

xx (By First Class Mail) At my business address, I placed such envelope for deposit with the United States Postal Service by placing them for collection and mailing on that date following ordinary business practices.

       Via Electronic Mail pursuant to the requirements of the Local Bankruptcy Rules of the Eastern District of California

xx (Federal) I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 16, 2021 at Santa Ana, California

/s/ Michaela Rice  
Michaela Rice